

From: [Koutoufidis, Nicholas](#)
To: ["Geoff Fallon"](#)
Subject: FW: Jacumba Community Sponsor Group comments on the revised JVR project plans(PDS2018-MUP-18-022)
Date: Wednesday, June 02, 2021 11:54:40 PM
Attachments: [PDS-534 for JVR Energy Park \(PDS2018-MUP-18-022\).pdf](#)
[Draft minutes of May 18, 2021 JCSG.pdf](#)
[Jacumba Community Sponsor Group ltr of May 31 2021 regarding the JVR Energy park.pdf](#)

Nicholas Koutoufidis, MBA

Land Use & Environmental Planner

County of San Diego

☎ 858.495.5329

PDS Website <http://www.sdcountry.ca.gov/pds/index.html>

PDS Mapping Service <http://gis.co.san-diego.ca.us/>

From: Cherry Diefenbach <csdiefenbach@sbcglobal.net>

Sent: Wednesday, June 02, 2021 9:12 PM

To: Koutoufidis, Nicholas <Nicholas.Koutoufidis@sdcounty.ca.gov>; LUEG, CommunityGroups <CommunityGroups.LUEG@sdcounty.ca.gov>

Cc: Jeffrey Osborne <jeff@jacumbahotsprings.com>; GREG CURRAN <gregcurran@sbcglobal.net>; jacari cousins <jaysoutherncafe@gmail.com>; Katrina Westley <katwestley@icloud.com>

Subject: Jacumba Community Sponsor Group comments on the revised JVR project plans(PDS2018-MUP-18-022)

Hi Nick,

Please find PDS-543, with its accompanying comments letter dated May 31, 2021 which address the Jacumba Community Sponsor Group's reasons for denying the revised 623-acre JVR project. Also attached are the draft minutes from our last sponsor group meeting held on May 18, 2021. The comments letter and meeting minutes identify some different issues regarding project plot plans dated 04/08/2021 and they merit a thorough review.

The sponsor group hopes PDS will require the developer to incorporate additional BMPs into a smaller project footprint (250 to 300 acres), one that is pulled further away from residences, scenic highways and the Jacumba Airport. We believe this is a reasonable compromise, one that will allow the developer to meet the goal of producing up to 90MW of power and one that will not destroy Jacumba.

This is my first time submitting a PDS project recommendation form and comments. If you have any questions, please contact me.

Cherry Diefenbach
619-743-5224



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

Record ID(s): PDS2018-MUP-18-022

Project Name: Jacumba Valley Ranch Energy Park

Planning/Sponsor Group: Jacumba Sponsor Group

Results of Planning/Sponsor Group Review

Meeting Date: May 18, 2021

A. Comments made by the group on the proposed project.

See attached meeting minutes of May 18, 2021

B. Advisory Vote: The Group ☒ Did ☐ Did Not make a formal recommendation, approval or denial on the project at this time.

If a formal recommendation was made, please check the appropriate box below:

MOTION:

- ☐ Approve without conditions
☐ Approve with recommended conditions
☒ Deny
☐ Continue

VOTE: 5 Yes 0 No 0 Abstain 0 Vacant/Absent

C. Recommended conditions of approval:

The sponsor group authorized the Chair to submit comments in opposition to the JVR Lager Energy Park plot maps dated 04/08/21.

Reported by: Cherry Diefenbach Position: Chair Date: 5-31-21

Please email recommendations to BOTH EMAILS;

Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770

<http://www.sdcounty.ca.gov/pds>



County of San Diego
Jacumba Hot Springs Sponsor Group
DRAFT Minutes of Regular Meeting 5:30pm on May 18, 2021
Jacumba Hot Springs, CA 91934

<https://us02web.zoom.us/j/81181825014?pwd=dENnUmxGZGZhWlVXc1lnb1JSNHJsUT09>

Meeting ID: 811 8182 5014

Passcode: 281588

The May 18, 2021 Jacumba Community Sponsor Group (JCSG) meeting via Zoom was called to order at 5:32pm.

JCSG Members Present: Seat 1. Jacari Cousins; Seat 2. Greg Curran; Seat 3. Cherry Diefenbach; Seat 4. Jeffery Osborne; Seat 5. Katrina Westley. **Public present:** 9. **County Staff:** Nick Koutoufidis – Land Use/Environmental Planner, Bronwyn Brown – Manager, Susan Harris – Environmental Coordinator, Regan Watt – Land Use/Environmental Planner. Also Geoff Fallon--BayWa project representative and Candace Magnus--Dudek representative.

A. Pledge of Allegiance. (waived--due to virtual meeting format)

B. Motion to approve the draft minutes of the JCSG virtual meeting held on April 20, 2021. M/S: Osborne/Curran. Passed 4-0-1 (abstain Westley)

C. Public Communication: The public may comment on any subject within the JCSG's jurisdiction that is not on the posted agenda. (Speakers are limited to 2 minutes and no action can be taken on non-agenda items.)

We had one speaker who expressed concerns about the proposed Cannabis and Social Equity Ordinance. She encouraged those present to speak out about the ordinance before the Board of Supervisors (BOS) vote on it.

D. Action items: (Agenda items may be taken out of order upon request)

1. Discuss/vote on the revised Jacumba Valley Ranch Energy Park (PDS2018-MUP-18-022) project.

The revised project involves the construction and operation of an enormous 90 megawatt (MW) solar energy facility on ~623 acres located within Jacumba's Rural Village on a 1,356 acre property formerly known as Ketchum Ranch. As currently configured, the project footprint stretches from the International border to an area just south of the Subway station along I-8. It would place solar modules and associated equipment (battery storage containers, inverters, transformers, a collector substation, and a large switchyard) within 547 fenced acres immediately east, north, and south of the community of Jacumba Hot Springs; north, south, and west of the Jacumba Airport, for about a mile along both sides of scenic Highway 80; and south of the I-8 corridor near the Jacumba exit/Carriso Gorge Road. **While the revised project provides slightly larger setbacks than the original project delineated in the DEIR, the MUP area is still six times the physical size of the village of Jacumba.** The project includes the following:

--Approximately 300,000 photovoltaic modules (12-feet high and up to 300 feet in length) mounted on single axis mechanical trackers that follow the movement of the sun from east to west. (The stowed panel position is parallel to the ground; at full tilt, the panel bottom is 38 degrees from perpendicular.)

--75 battery storage containers--three containers at each of the 25 sites (containers are 55-feet long, 19-feet wide and 10-feet high).

--25 inverter/transformer metal platforms on skids (8-feet wide and 20-feet long) adjacent to battery containers.

--5,000-feet of an underground electrical collection system.

--An on-site collector substation (152-feet by 180-feet) and a 200-foot-long 65-foot-high overhead slack span transmission line that connects the collector substation to the switchyard.

--A 138kV switchyard (3.2-acres) adjacent to the collector substation with 1,860-feet of overhead transmission lines strung on (five) 70-115 feet high steel poles which will loop the switchyard into the existing SDG&E Boulevard-East County Transmission Line. This project is described as an "interim" land use with the project life projected as 35-37 years. Given that the switchyard will be turned over to SDG&E at the decommissioning of the solar project, it is likely to be followed by another industrial scale energy project. This essentially eliminates any future expansion of Jacumba as the best available land within the village boundary that could support affordable housing, agriculture and recreational uses or even an international border crossing has been squandered.

--The MUP project area will be enclosed with a 6-foot high slatted chain-link fence with three strands of barbed wire on top, and high voltage signage. Because the MUP area south of Old Hwy 80 has historically been prone to flooding, solar panels within that area may be raised as much as five feet above grade and flood fencing will be used. (A slatted perimeter fence around the project area will not adequately screen raised modules.)

--All former farm buildings and the vast majority of trees within the MUP area will be removed. (The old farm buildings and the nearby trees are routinely used as perches and scouting posts by a variety of large raptors.)

--A landscaping plan will be implemented from the project fencing outward 15 feet on both sides of Old Hwy 80, next to the town, and along some portions of Carrizo Gorge Road. The developer will maintain it for the lifetime of the project.

--During the estimated 13-month construction period, up to 500 construction workers will arrive at the site per day. Construction hours are projected as 7 am to 4 pm Monday through Saturday. (The DEIR did not identify any additional first responder staffing although the construction project will essentially double the population of the town. Jacumba's current firefighter staffing is just 2 people.) This solar site will be unmanned when completed.

a. **The Chair summarized recent community feedback on the revised JVR facility after project maps were posted and an informal polling of residents was conducted.** Of 125 responses received, only two residents believe the proposed 623- acre solar facility would provide any benefit to the town. The vast majority of Jacumba residents believe the current scale of the project would do irreparable harm to community character, property values, future tourism, scenic vistas, local wildlife, and safety of glider operations at the Jacumba glider port, etc.

b. **Geoff Fallon, a BayWa representative, provided a presentation describing the revised project and its larger setbacks as well as the permanent conservation of up to 435 acres of habitat adjacent to state park and federal wildlife lands.** During Fallon's presentation, the sponsor group was surprised to learn the project developer had initiated proposed community benefits agreements with the Jacumba Community Services District and with the Imperial Valley Desert Museum. **As neither of these entities represent the community of Jacumba with regards to land use issues, recommendations, and decisions, the Chair requested Mr. Fallon provide the sponsor group with a copy of those proposed benefits agreements to review as soon as possible.** As BayWa is looking for additional benefits ideas from Jacumba, it was suggested

that the JVR project include a microgrid electrical power supply loop to the town of Jacumba—one that would provide backup electrical power to residences/businesses on the occasions when the normal power has been shut off by SDG&E due to Santa Ana winds. Mr. Fallon stated he was not an electrical engineer but that he thought that doing so would be very complicated. (A microgrid connection from a much smaller SDG&E solar facility currently under construction in Campo will provide power via battery backup to the San Ysidro Health Center and a few other nearby Campo businesses.) Because the JVR project is not designed to provide power distribution, Fallon suggested that we could contact one of the community choice aggregates (CCA) in the county to see if we could purchase our power from them. When asked if he was familiar with the May 17, 2021 *SDUT* article which stated the San Diego Community Power CCA would vote in late May on a 20-year power purchase agreement for 90MW of solar power from the JVR solar facility, Mr. Fallon disclosed that BayWa is in late stage negotiations with them. The sponsor group believes the signing of a JVR power purchase agreement (PPA) before the release of the final EIR, and Planning Commission and BOS hearings is premature and it gives the appearance that PDS staff may have provided the developer with an early indication that this solar project will be approved.

Mr. Fallon's presentation also included a discussion of the Community Buffer Alternative described in the DEIR. This alternative provides an option for a larger 300-foot setback (18.9 acres) from residential properties located north of Old Hwy 80 that would help to mitigate project noise and soften the visual impact of the solar panels. When asked if the community buffer alternative option would impact the facility's ability to produce up to 90MW of power, Fallon stated that solar module efficiency improvements would likely allow energy production to remain at 90MW. **Since distance is a major mitigation strategy for reducing the noise impact to the community, the sponsor group was surprised that the developer did not include the larger community buffer setbacks if the facility would still meet its stated energy goal of producing up to 90MW of power. Magnus: An updated acoustical report of the proposed project will be included in the final EIR.**

Some questions and comments expressed after Mr. Fallon's presentation follow:

--Curran: Why not put this project in the desert instead of ruining our community? Fallon: It is being sited here because of land characteristics and its close proximity to three existing transmission lines. These elements make it a viable project, one that will meet our energy production goals.

--Osborne: How will the project mitigate its impact on tourism? Fallon: We have tried to address the community's concerns regarding this issue in the final EIR. I cannot speak to the future state of tourism in Jacumba based on this solar project.

--Osborne: How far back is the developer willing to pull back from the town and our scenic vistas? Where is the developer willing to compromise on the final project size? Is the company willing to compromise on a much smaller project? Fallon: No, we have already made some accommodations to the community by incorporating larger setbacks into the revised plan.

--Hafdel: Are there any other locations in San Diego County where a solar facility of this scale been constructed? The PDS staff were unable to provide an example of another solar project of similar size and scale that has been constructed within a village boundary in San Diego County. (The solar facility in Ramona is only 43 acres.) Westley: So, the local residents and the project's impact on them is not important? This is just another example of Jacumba getting dumped on. Diefenbach: Unfortunately, the property owners/renters in Jacumba who do not want to live next to this utility-scale solar facility lack the resources to move to a more expensive community.

--Cousins: Now that property values in Jacumba are finally beginning to go up, how will this huge project affect them? Local Jacumba realtor, Breck Schoch, stated that he believes the industrial scale

of the JVR project will negatively affect local property values. He also believes that agriculture or the expansion of the town would be a much better use of the property. Harris: The issue of property values will be addressed globally in the final EIR. Magnus: The final EIR will globally discuss social-economic concerns. Brown: CEQA doesn't require a discussion of the project's impact on property values. That is something that you can bring up at the Planning Commission and BOS hearings.

--Alasdar Mullarney, the director of operations for the Associated Glider Clubs of Southern California, and a seasoned glider pilot who has launched many gliders from the Jacumba airport, addressed his concerns regarding the project's impact on the safety of glider operations: "I strongly object to the JVR project wrapping around the airport runway. We have had a number of launch failures in which the gliders landed in the area where the solar modules and battery storage containers will be placed—I believe their placement will be extremely hazardous and even life threatening." Diefenbach: Mr. Mullarney, you train student glider pilots out of this airport. Do you think the placement of electrical components along the sides of the runway and a row of battery storage containers in front of the runway will be unnerving to inexperienced pilots? Mullarney: They most certainly will. Koutoufidis: The FAA's initial finding regarding this project was a "no hazard determination." Mullarney: The FAA's finding is wrong. I have requested that the FAA conduct another glare study as the one in the draft EIR did not fully appreciate the glare impact as it pertains to glider operations.

--Halstead: Is there any plan for an airport runway expansion? Koutoufidis: As part of the CEQA process, the JVR project was reviewed against the current Airport Compatibility Land Use Plan (ACLUP). I believe that there is a newer draft ACLUP but I am not aware that the project addresses any future runway expansion. Osborne: From my perspective as the owner of the Jacumba resort, future tourism would potentially be enhanced if people were able to arrive by single engine aircraft and land at the Jacumba airport.

--Sigmon: I am concerned that the project will suck up every foot of viable land on which Jacumba could expand. I am also worried about the potential impact of solar module glare on viewers like gliders, and hillside residences. Project fencing will not adequately mitigate the glare produced by solar modules that have been raised due to their placement in a flood plain area. Magnus: A new glare study that addresses the impact of glare on glider operations and the Jacumba residences on the southeastern hillside will be part of the final EIR. Koutoufidis: Solar modules will have an anti-glare coating.

--Westley: I moved to Jacumba for the scenic vistas, for the peace and quiet—everything that will be negatively impacted by the JVR project. After my review of the preliminary JVR landscape plan, I found that many of the trees/plants listed are inappropriate for our semi-arid, high desert region. Magnus: The landscaping plan is being submitted to the County for approval. Diefenbach: The sponsor group will also provide recommended changes to the JVR landscaping plan.

--Westley: The 50-foot-wide wildlife crossing located in the northern section of the project area is inadequate in width as it will predispose animals to predation. The crossing should be widened and native plants should remain or it will not fulfill its intended purpose. Harris/Magnus: There a dedicated wildlife corridor located along the northwestern edge of the project area that will provide a linkage with state park land where camera installations will monitor the functioning of the corridor. That area is part of the 435 acres of dedicated biological open space required as mitigation for the project. The small wildlife crossing was put in at the request of the county biologist as an escape route of sorts and it is not intended to serve as the primary wildlife corridor. The final EIR will address criteria for the wildlife crossing.

--Westley: I am also concerned that the demolition of the historic farm buildings and the removal of all the trees near those buildings will have a significant impact on multiple species of raptors that

currently use the buildings and trees for perching, nesting, and roosting. How will the project mitigate its impact on raptors? Magnus: I really can't tell you how the project will mitigate that. Diefenbach: When solar panels are placed on that knoll, I don't see how fencing and landscaping at an elevation that is 100 feet lower can possibly serve as a realistic visual mitigation measure. Fallon: We try to address the changes in topography in our plan.

--Osborne: How will the project mitigate for the photovoltaic (PV) heat island effect which may increase temperatures in our village as much as 10 degrees F? This issue was also brought up by state parks in their DEIR response as well. Harris: There will be a global response on the PV heat island effect in the final EIR which is still being drafted. Osborne: So, we are supposed to vote on a project when we don't know the extent of environmental impacts to our town? Koutoufidis: I think the project provides enough detail for the group to vote. Harris: If there was a new significant impact, we would have to recirculate another draft EIR. We are not seeing that. There will be a global discussion of the PV heat island effect in the final EIR.

--Osborne: This question is for Nick--Do you think this project is consistent with the goals in our Mountain Empire Sub-regional Plan? Koutoufidis: Yes, we believe the findings of this major use permit are compatible with the plan in bulk, scale, height, and operational characteristics. PDS will write a recommendation to the Planning Commission based on the findings in the final EIR.

--Jannen: How will the project mitigate the loss of GHG (carbon) sequestration that occurs from the soil and existing plants? Magnus: The final EIR will include a GHG analysis. Diefenbach: The soil in the project area has been agricultural land for 65 years, I am concerned that during project grading, soil will be sold and redistributed to other parts of the county. **The sponsor group will request language in the final grading plan that specifically prohibits the bulk sale and removal of soil from the JVR project area.**

--Osborne: I am curious why SDG&E will own the switchyard in perpetuity after the "interim" solar project is decommissioned in ~35 years. Fallon: The switchyard is necessary to directly connect the power produced by the solar facility into the 138kV transmission line. The Independent Service Operator (ISO) considers the switchyard to be necessary part of the project for network reliability. Diefenbach: There is no need for the switchyard to remain after the JVR project decomm, unless of course, there is another follow-on green energy project that will go into the area. If that is the case, describing this utility project as an "interim" land use is, at best, extremely disingenuous to the residents of Jacumba. Koutoufidis: I know there was a DEIR question about whether the switchyard was optional, and whether power generated by the solar facility could be sent directly via underground transmission lines to the SDG&E ECO Sub-station. The earthwork needed to underground the transmission lines would negatively impact biological resources and increase the release of GHG in the northern part of the project area.

--Diefenbach: Mr. Fallon, I have some general comments/questions about the revised JVR plan. It is my understanding that your project will be using lithium-ion batteries which are potentially flammable. Why is your project using them in a high wildfire hazard area? Also what is the projected lifespan of that type of battery? Fallon: I believe the lithium-ion battery is correct but we haven't selected the manufacturer yet. Diefenbach: Why isn't the project using ESS iron flow batteries which present no fire, chemical, or explosive risk? This type of battery would greatly reduce the need for fire suppression equipment and it would also eliminate hazmat concerns. The ESS battery chemistry contains no toxic materials and it is fully recyclable at the end of its 25-year lifespan. SDG&E is currently installing ESS batteries in a 1MW solar project that is under construction in the Campo area, another wildfire prone area similar to Jacumba. **The sponsor group will request the developer uses the environmentally safer and non-flammable (iron flow) batteries regardless of the final size of JVR facility as a condition of approval.**

--Diefenbach: Solar technology appears to be rapidly changing and improving. Solar module efficiency is a critical component of green energy production because it means you can achieve a higher energy output from a smaller project footprint. Solar modules are the most expensive part of the project. Specifically, I have several questions about your solar modules. What is their rated efficiency, and what is their projected lifespan? If the lifespan or solar module warranty does not cover the entire period of the project which the DEIR states to be 35-38 years, what is your plan for solar module replacement? Does this mean that the community will be negatively impacted by a follow-on construction project again in 20 to 25 years when the JVR solar panels become obsolete? Fallon: Our company has not selected a specific solar module yet but we will use a top-tier bifacial module. I don't have a specific efficiency rating for the modules. Diefenbach: What is a bifacial solar module? Fallon: A bifacial module captures direct sunlight through the top of the panel and sunlight reflected from the ground. Diefenbach: If bifacial modules capture sunlight on both sides of the panel, it seems like these solar panels could be placed closer together than the traditional monofacial modules and still achieve a higher efficiency with a reduced footprint. What is the distance between solar arrays and are the solar modules and batteries recyclable? Fallon: The solar modules are largely recyclable. **The sponsor group will request the project developer invest in most efficient solar modules currently available even if it means higher-up-front costs to the developer.**

--Diefenbach: The DEIR stated that the JVR project will use 11 acre-feet of water from existing wells to wash solar panels four times per year. With climate change impacting our area in terms of less annual rainfall, what will your project do to reduce its water usage from our shared local aquifers? Why doesn't your project use a motorized nylon brush "dry" dusting system that is currently being employed in other arid countries? This dry dusting system could offer saving of up to 90 percent of the projected water usage for module cleaning. Koutoufidis: Groundwater monitoring will be conducted during construction and decommissioning. Groundwater reports are required for the first five years of the project. After five years, the county geologist will determine if continued reporting is necessary. **The sponsor group will request that the project developer uses a dry brush dusting system for solar module cleaning instead of wasting 44 acre-feet of water per year from local aquifers as a condition of approval for any utility-scale solar facility.**

--Diefenbach: Does the revised plan include additional firefighting staffing during the construction phase of the project when the construction workers will double the size of the town? Magnus: Additional firefighter staffing will be addressed in the final EIR. Fallon: There is a condition in the final EIR that will require the developer will pay for additional firefighter staffing during construction.

--Diefenbach: I also have some specific questions and concerns with the revised JVR plot maps dated 4/08/2021: These maps do not identify the 435 acres of dedicated biological mitigation lands. **Request the developer identify biological mitigation lands on subsequent plot maps.**

Sheet 001: Note 15 addresses the requirement to cover all disturbed areas with organic mulch or approved equal to reduce dust. It further states that disturbed areas are to be seeded and watered regularly and "permanently during construction." **Clarify project wording to reflect the maintenance of disturbed areas after construction and over the lifespan of the project.**

Note 19 states that solar facilities may be relocated, reconfigured or revised with administrative approval of PDS. The community should be notified and invited to comment when the changes are significant. Koutoufidis: Only 10 percent of the project can be changed without community notification. **Developer shall clarify the plot plan wording to reflect that up to 10 percent of the project may be changed administratively.**

Note 23: **Require project signage in English and Spanish due to the facility's close proximity to the international border.**

Sheet 100 (overall plot plan): This plot map shows the entire MUP area southeast of town and south of Hwy 80 is enclosed with some type of flood fencing. This indicates the developer is well aware that they are placing energized high voltage equipment in a historical flood plain area. Raising solar panels as much as five feet above grade and then pretending that a six feet high fence with landscaping will adequately screen the solar panels in a scenic viewshed is ludicrous. **The sponsor group believes that high voltage electrical equipment should not be sited in a historic flood plain area.**

Also, the developer should widen wildlife crossing to a minimum of 100 feet and ensure sufficient native plants are maintained for cover.

Sheet 101: This map shows three battery storage containers, an inverter, and a transformer placed within a seasonal drainage feature. Does this mean the feature will be eliminated by fill? **Relocate equipment as appropriate.**

Sheet 102: There are a number of inconsistencies between the type of fencing that is identified on this map and the type of fencing shown on Sheet 100--One map shows flood fencing along the south and north project boundaries near the collector substation, the other does not. **Review sheets 100 and 102 and correct fencing inconsistencies.**

Sheet 103: Project representative stated at the May 18 sponsor group meeting that the community alternative setbacks could be incorporated and still meet energy production goals of up to 90MW. **County should require the developer to provide 300-foot-wide minimum setbacks next to residences and trailer park area (Community buffer alternative).**

Sheet 104: If high voltage elements like solar panels and batteries etc., are to be sited in the flood plain area south of Old Highway 80 near the Jacumba Airport, **relocate the row of batteries, inverters, and transformers south of the runway closer to the border fence.** This will reduce their potential impact on the safety of glider operations.

Sheet 202: Shows the profile on a solar module with the top of the module as much as 12 feet above grade--No meaningful screening by a six-foot-high fence.

Note 5: **Correct wording to read: "east and northeast" of Carriso Gorge Rd.**

Sheet 300: Same comment as Sheet 104 regarding the row of batteries, inverters.

Sheet 400 BMP: Post Construction Maintenance note: Will the area under the solar modules be seeded for the lifetime of the project? **Clarify who makes the decision if remedial action is needed to restore plant stocks, etc?**

The MUP project boundary located north and south of Old Highway is described as having a silt fence. **The final EIR should describe how silt fencing be used in conjunction with flood fencing or break-away fencing.**

This sheet shows mapped elevations of 2895 and 2875 in the areas immediately west and south of the farm buildings located on a knoll. Visually, the former farm buildings which are mapped at an elevation of 2825 feet appear to be higher in elevation than those areas. **Review/revise mapped elevations near the farm buildings to ensure correctness.** Also, the final EIR should explain how the fencing and landscaping along Old Hwy 80 at an elevation of 2795 (100 feet lower than the solar panels on the knoll) will provide a viable mitigation for the aesthetics of the project.

Move battery/inverter/transformer row shown next to Jacumba residences 300 feet north of their mapped location to mitigate for mechanical noise.

Notes 11 and 12 need clarification. "All areas being cleared and grubbed shall be seeded with hydro stabilization during summer and winter construction?" **Define "timely**

manner” (in Note 12), and identify who will decide if the contractor needs to stabilize vegetative growth?

Sheet 500: Many of the trees and plants listed in the preliminary plant legend are not native, drought tolerant or appropriate for our area. Jacumba Sponsor Group will provide recommended changes.

Sheet 502 figure B2 shows a misleading representation of landscaping growth after just five years. Trees and plants planted in Jacumba are slow growing even when regularly watered. (The landscaping planted in 2013/2014 to screen the Boulevard substation on Hwy 80 provides a realistic example how landscaping matures in the Boulevard/Jacumba areas.)

Following the question and answer period, the Chair reminded sponsor group members that although many of their questions were not adequately answered by PDS staff and/or the project representative, they will be voting on whether to approve, conditionally approve or deny the revised 623-acre plan.

Motion to deny the 623-acre JVR solar project plan as presented. M/S: Westley/Curran. Passed: 5-0-0. The sponsor group authorized the Chair to submit PDS-534 form with the reasons for JVR project denial as well BMP suggestions that the County should require as conditions of any size project approval. Koutoufidis: Cherry, if you send me the group’s suggestions, we will definitely review them.

The Planning & Development Services (PDS) project manager for the JVR project is Nicholas Koutoufidis (nicholas.koutoufidis@sdcounty.ca.gov or 858-495-5329). The revised 20-page JVR project plan can be viewed at: [https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/DEIR/AdditionalDocs/JVR0Plot%20Plans%20\(Optimized\).pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/DEIR/AdditionalDocs/JVR0Plot%20Plans%20(Optimized).pdf).

- 2. Discuss/vote on the need for a crosswalk across Old Highway 80 at Carriso St. near the Highland Community Center and the Jacumba Library.** *Carried over to our next meeting.*
- 3. Discuss the status of the trash/appliance/mattress dumping that has been occurring for more than six months at the former recycling business located on scenic Hwy 80 west of Jacumba.** Should the sponsor group chair formally ask Supervisor Joel Anderson’s office to get involved in finding a solution? *Carried over to our next meeting.*

E. Group business and Project Updates-discussion only:

1. Announcements and correspondence. None.
2. Community interface and other reports. None.
 - a. Fire Safe Council
 - b. Revitalization

F. Adjournment:

The sponsor group meeting was adjourned at 8:07pm. The next regular Jacumba Sponsor group meeting is scheduled for Tuesday, June 15, 2021 at 5:30pm.

Purpose of Planning and Sponsor Groups:

Advise the County on discretionary projects as well as on planning and land use matters that are proposed within their respective community planning or sponsor group area.

May 31, 2021

County of San Diego Planning and Development Services
5510 Overland Ave, Ste.310
San Diego, CA 92123
ATTN: Nick Koutoufidis

Subject: Jacumba Community Sponsor Group Comments on the revised JVR Energy Park (PDS2018-MUP-18-022)

To whom it may concern:

On May 18, 2021, the Jacumba Community Sponsor Group (JCSG) voted unanimously to deny the revised JVR project as described on the plot plans dated 04/08/21 for a variety of reasons. (See draft meeting minutes of May 18, 2021 which contain general comments/questions and requests for specific clarifications on the project plot maps.)

Jacumba Hot Springs is a diverse community with a population of ~570. Many of our residents are economically disadvantaged families or seniors who live on small fixed incomes or disability benefits. (Currently, there are also four sexually violent predators living under supervision in our community.) Our residents moved to Jacumba for its scenic views, quiet rural landscapes, safe streets, and affordable homes and they have the most to lose if this “interim (35-38 year) industrial-scale solar facility, six times the physical size of our village is approved.

The proposed JVR solar facility will stretch from the Interstate 8 corridor (near Exit 73) south to the international border, and along both sides historic Highway 80. These scenic roadways serve as the gateways through which visitors approach Jacumba. Project fencing and landscaping will not adequately screen the visual blight and mechanical noise generated by hundreds of acres of solar modules, batteries, inverters, transformers, a large collector substation, and an even larger electrical switchyard. **So, how will the County mitigate for lost tourism revenue at the Jacumba businesses that are currently struggling to survive and even prosper?**

This massive green energy project will consume the best available agricultural or residential land within Jacumba’s rural village boundary. It clearly does not conform with the Mountain Empire Sub-Regional Plan’s land-use goals.

--“Encourage the development of land in a manner that reinforces the unique identity of the Mountain Empire Sub-region and its communities.”

--“Avoid the creation of a landscape foreign to that of surrounding sites.”

--“Provide a land use pattern that will accommodate the forecast population increase while retaining the rural charm of the present living environment.”

--“The community supports new development that preserves the natural and historical environment, including water resources, and protects existing neighborhoods, manages growth to reinforce the rural character of the area, which includes agriculture, open space, and trails...”

--“Industrial development is not compatible with the goal of maintaining the rural character of the sub-region...”

Jacumba residents know that a facility of this magnitude would never be sited adjacent to a “richer community” like La Mesa, Encinitas, Chula Vista, or Del Mar. The sponsor group believes that County’s

approval of the 623-acre revised JVR project will set a dangerous land-use precedent—one that will ultimately lead to the further industrialization of our backcountry landscapes.

The glider community of San Diego has stated that solar panel glare and the placement of high-voltage solar facility equipment south of scenic Highway 80, and around three sides of the Jacumba airport runway, may have lethal consequences for inexperienced glider pilots. Elevating solar modules in the flood plain area near the runway will not be viewed by the primary users of the airport (glider pilots) as operationally safe and this may limit their future usage of the airport. This will negatively impact the flow of visitors to Jacumba and financial support to local businesses.

Of course, once solar panels are installed south of Old Highway 80, there will be no further discussion of a future international border crossing as was identified in DEIR comments. This is yet another example of how this utility project will potentially eliminate new commercial activity that would bring jobs to local residents and ensure Jacumba's future vitality.

Climate change is real, and it is already impacting Jacumba in terms of higher local temperatures and lower annual rainfall. **The JVR project fails to address the photovoltaic (PV) heat island effect, a potential 10-degree F rise in ambient temperature which could have a negative impact on elderly residents as well as the vegetation on the east side of town.** The introduction of yet another high voltage ignition source in our fire-prone landscape makes absolutely no sense—The current firefighter staffing of two personnel is woefully insufficient to meet the daily needs of Jacumba residents and travelers on the I-8 corridor, plus an additional daily construction crew of up to 500 workers.

The sponsor group believes the revised JVR project fails to incorporate best management practices (BMPs) which could substantially alleviate some of the negative impacts to our community and the natural environment. The County should require that the developer incorporate the following BMPs into any industrial solar facility, regardless of its final size, that is sited in a rural, high fire danger area, like Jacumba:

---Based on the DEIR's description of the JVR facility, it will use potentially flammable lithium-ion batteries. **The County should require the developer use the environmentally safer ESS iron flow batteries (or similar) as a condition of project approval.** These second-generation ESS iron-flow batteries which present no fire, chemical, or explosive risk, are currently being installed by SDG&E at a smaller solar facility located in Campo.

--According to the DEIR, the JVR solar project will waste 11-acre feet of water from local aquifers each time solar panels are cleaned, on a quarterly basis. In other arid regions of the world (like India), solar facilities employ a dry, motorized brushing system which saves up 90 percent of the water usage. County planners appear to think that groundwater monitoring of private wells is sufficient to track any potential impact of water usage on the local water table. All utility-scale solar facilities like the proposed JVR project, must respect the finite nature of shared local aquifers in groundwater dependent communities. **The County should require that the JVR project use a more environmentally-sustainable water saving system for solar module cleaning.**

--The JVR developer must be required to use the most efficient solar modules available even if they cost more to buy and install. **Also, if the JVR solar module warranty does not meet the lifespan of the project (35-38 years), the final EIR should address any potential impacts to the community (noise, traffic) if current solar modules become obsolete and/or their warranty necessitates whole-scale module swap out.**

--Given the rapid advancements in solar technology, the sponsor group questions whether a 543-acre solar facility footprint is really necessary to produce 90MW of energy. For example, the BayWa representative told our group that the larger community buffer alternative could be implemented and the project would still be able to accomplish its stated goal of producing up to 90MW of power. If so, then why

didn't the developer incorporate the 300-foot setback (the community buffer alternative) into their revised project plans thereby showing their willingness to make a meaningful compromise in an effort to mitigate the project's impact on the community? **The sponsor group requests as a minimum, that 300-foot setbacks next to all private residences be a part of any approved JVR solar project plan.** How is it that the 108-acre Jacumba Solar project built by BayWa in 2017 which uses fixed (non-tracking), south-facing solar modules is able to produce 28MW of power? Based on production values from that less sophisticated solar technology, the new JVR solar facility using bifacial modules should be able to produce up to 90MW of power on a significantly smaller footprint, somewhere in the range of 250 to 300 acres. (Bifacial solar modules while more expensive than monofacial modules, offer as much as a 30 percent improvement in efficiency.) At this point in the CEQA review process, our sponsor group should have been provided with solar facility specifics and we should have had some real answers to our questions about module efficiency, distance between solar arrays, and type of battery that will to be used. After all, on May 24, 2021, BayWa knew enough about JVR project specifics to enter into a 90MW 20-year power purchase agreement with the San Diego Community Power (SDCP) group.

At our May 18, 2021 sponsor group meeting, we learned that BayWa had initiated benefit agreements with two non-profit entities (Jacumba Community Services and the Imperial Valley Desert Museum) who do not speak for the community of Jacumba with regards to land use decisions and their identified impacts to our town. Although we requested that BayWa provide us with a copy of the proposed benefits packages, to date, we have not received that requested information. **In the interests of transparency, the sponsor group asks for the County's help in getting that information from BayWa representatives as soon as possible.**

The community also requests that BayWa investigate the feasibility of providing a backup power source to Jacumba when the town's normal power source is unavailable due to Santa Ana winds. The JVR facility will continue to store and provide power to the electrical grid even during Santa Ana events. **A backup power transmission loop to Jacumba could be a meaningful benefit to residents.** (A similar electrical loop will provide backup power to selected businesses and public schools from SDG&E's 1MW solar project in Campo.)

A large number of the trees and shrubs on the preliminary JVR landscaping list found on Sheet 500 of the revised plot maps are inappropriate for Jacumba's micro-climate, as many them are not drought tolerant and they are slow-growing. The preliminary landscaping plan should be amended as follows:

--TREES: Using the two-letter codes listed on the JVR preliminary plant legend, remove the following trees: DS, PC, QC, and QE. Consider adding the following trees: *Pinus cembroides* (Mexican Pinyon), *Prosopis glandulosa* (Honey Mesquite), *Chilopsis linearis* (Desert Willow), and *Juniperus California* (California Juniper).

--SHRUBS: Remove the following shrubs: AB and GS. Consider adding the following shrubs: *Sambucus Mexicana* (Mexican Elderberry), *Simmondsia chinensis* (Jojoba), and *Caesalpinia pulcherrima* (Mexican Bird of Paradise).

During our last sponsor group meeting on May 18th, PDS staff and the BayWa representative were unprepared to respond to our questions and concerns about this complex project. As a matter of procedure and as an issue of honesty and forthrightness, the project developer should make a greater effort to provide personnel with a thorough understanding of project parameters at community meetings. The steady stream of non-answers, or partial answers such as --"that issue will be addressed globally in the final EIR" or "we haven't decided on the solar equipment we will be using" which we received prior to our vote on this project does a real disservice to the CEQA review effort. It does not serve the county decision-makers well and nor does it foster Jacumba's confidence in what appears to be a flawed and skewed planning process, one that benefits urban communities at the expense of their rural neighbors.

The community of Jacumba is not averse to green energy projects in our area--we previously supported BayWa's 2017 Jacumba solar project. As we have stated before, we are willing to compromise on a smaller project footprint of 250 to 300 acres, one moved well north of scenic Highway 80, and away from residences and the Jacumba airport. Our group is currently developing a shared vision for some of the JVR MUP acreage that would not be used for solar panels. Our plan includes a more expansive and thoughtful wildlife corridor adjacent to state park lands, a future airport safety and expansion area, and a central valley area which would support a mixture of agricultural, residential (affordable housing), and recreational uses.

In an era of environmental and economic justice, our low income, ethnically diverse community should not bear the brunt of industrial-scale green energy projects like the JVR Energy Park, which sends all of their generated power to urban centers at the expense of our rural quality of life. If we are truly to reverse the impacts of climate change, County leaders should be actively incentivizing rooftop solar installations for businesses and residences. They should also seek ways to site smaller utility projects and/or battery storage units nearer to the locations where the power will actually be used...Those simple tenets should be the pillars of the County's plan for future green energy generation.

Submitted by:

Cherry Diefenbach, JCSG Chair

CC:

KUSI, East County Magazine, KPBS, KOGO, SDUT, and Districts 1-5 BOS